

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA

v.

(2) STARR ILZHOEFER
a/k/a Starr Campbell

DOCKET NO.

**FACTUAL BASIS AND JOINT
STATEMENT OF RELEVANT
CONDUCT**

NOW COMES the United States of America, by and through by and through William Stetzer, Attorney for the United States acting under authority conferred by 28 U.S.C. §515, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office this "Joint Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4.

1. The defendant, STARR ILZHOEFER, agreed with Aaron Guido to commit an offense against the United States, in violation of Title 18, United States Code, Section 1014 (making false statements in relation to a loan).

2. At times related to the conspiracy, Cenlar was a financial institution, the deposits of which were insured by the FDIC or which qualified as a mortgage lending business.

3. ILZHOEFER and her ex-husband, D.I., experienced personal financial hardship that led to their default on a mortgage held by Cenlar that was secured by their home at 257 Victoria Avenue.

4. On or about February 19, 2014, ILZHOEFER and Guido knowingly submitted a Uniform Borrower Assistance Form to Cenlar that included false statements about ILZHOEFER's finances.

5. On June 5, 2014, Cenlar foreclosed on 257 Victoria Avenue.

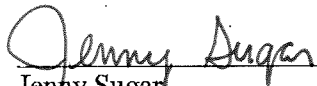
6. On or about July 28, 2014, Guido, through a business owned by Guido and ILZHOEFER, placed a bid for the foreclosure auction sale of 257 Victoria Avenue with a bid price of \$307,127.81.

7. On or about October 17, 2014, ILZHOEFER and Guido sent, and caused to be sent, to Cenlar, a check for \$307,127.81, which represented the funds for the bid for the auction sale of 257 Victoria Avenue.

8. Guido and ILZHOEFER, knowingly made, or cause to be made, or aided and abetted, the materially false statements identified in Paragraph 4 for the purpose of influencing Cenlar's action.

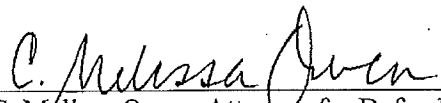
9. The principal balance on the mortgage was \$394,505.17, so the deficiency and guideline loss amount was \$90,146.36. The guideline loss amount is more than \$40,000 and less than \$95,000.01.

WILLIAM STETZER
ATTORNEY FOR THE UNITED STATES¹


Jenny Sugar
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Information, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Information, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.


C. Melissa Owen, Attorney for Defendant

DATED: 2-21-19

¹ Acting under authority conferred by 28 U.S.C. §515.